

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : Case No.: 23-cv-9304
Plaintiff, :
v. :
THE M/Y AMADEA, a Motor Yacht:
Bearing International :
Maritime Organization No. :
1012531, Including All :
Fixtures, Fittings, Manuals,:
Stocks, Stores, Inventories,: New York, New York
and Each Lifeboat, Tender :
Defendants. : February 22, 2024

TRANSCRIPT AND STATUS CONFERENCE HEARING
BEFORE THE HONORABLE DALE E. HO
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For Government: UNITED STATES ATTORNEY'S OFFICE
BY: Joshua Sohn, AUSA
Jennifer Jude, AUSA
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For Claimant FORD O'BRIEN LANDY
Eduard Khudainatov BY: Renee L. Jarusinsky, Esq.
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4 The Honorable Dale E. Ho presiding in the
5 matter of United States of America v. The M/Y
6 Amadea; Docket Number: 23cv9304.

9 MR. SOHN: Joshua Sohn for the United
10 States.

11 MS. JUDE: You also have Jennifer Jude from
12 the United States.

13 MS. ZHENG: Yifei Zheng for the United
14 States.

15 MS. JARUSINSKY: Is that it for the United
16 States?

17 MS. JUDE: Yes.

18 MS. JARUSINSKY: Thank you. Renee
19 Jarusinsky from Ford O'Brien Landy on behalf of
20 claimants, Eduard Khudainatov and Millemarin
21 Investments. And with me also on the line are my
22 colleagues, Adam Ford and Bryan McCracken.

23 THE DEPUTY CLERK: Sorry, just give me one
24 moment.

25 || Counsel, this is a reminder that this is a

1 public proceeding. Members of the public and press
2 can access the proceeding with a public dial in
3 number.

4 Please be aware that just as if you were
5 physically present in the courtroom, you are
6 prohibited from recording, rebroadcasting, or
7 disseminating any recording of court proceedings,
8 including this one.

9 Your Honor.

10 THE COURT: Good afternoon, everyone.
11 Thank you for jumping on the phone for this
12 conference.

13 We're here on the claimant's motion for
14 expedited discovery. There's also an application to
15 file something under seal, which hopefully we can
16 get to briefly at the end here. But I've reviewed
17 the submissions.

18 Why don't I let the claimants give me a
19 sort of overview of their request, and then I may
20 interrupt with questions.

21 Ms. Jarusinsky, are you going to speak for
22 the claimants?

23 MS. JARUSINSKY: Yes, I am. Thank you,
24 Your Honor.

25 THE COURT: Okay.

1 MS. JARUSINSKY: Your Honor, the claimants
2 will -- intend to oppose the government's motion for
3 interlocutory sale on the merits. But we also
4 intend to oppose it because there is an important
5 preliminary issue that we've brought to Your Honor's
6 attention that must be addressed before the
7 interlocutory sale is decided. And that issue is
8 whether or not the government even has lawful
9 possession of the Amadea to begin with.

10 After all, our view and common sense is
11 that the government shouldn't be permitted to sell
12 something it doesn't possess legally.

13 Claimants came forward with evidence
14 raising serious questions about the veracity of the
15 Bergen affidavit. The affidavit that was used to
16 obtain the seizure of the Amadea that was filed here
17 in the United States on April 13th of 2022.

18 That affidavit is redacted, as we've
19 informed Your Honor, and we've repeatedly asked the
20 government for it, including going as far back as
21 September of 2022. But they have up until now
22 refused to produce an unredacted copy of it.

23 So, just to be clear, the evidence that
24 we've presented about the Bergen affidavit is
25 basically the Bergen affidavit that was subsequently

1 filed in Fiji, which is unredacted, as well as
2 contemporaneous notes taken by crew members who were
3 interviewed by law enforcement. And when you review
4 the contemporaneous notes, you see that none of
5 those notes say that any crew member said that
6 Kerimov owned the Amadea. Whereas when you look at
7 the Bergen affidavit that was submitted in Fiji, it
8 states that multiple crew members stated that
9 Kerimov owns the vessel.

10 And another sort of key issue there is that
11 certain of the notes reflect the fact that some of
12 the crew members actually identified our client,
13 claimant, Mr. Khudainatov as the owner of the vessel
14 or the guy who'd always owned it. And that
15 information is conspicuously absent from the
16 affidavit that was submitted in Fiji.

17 So these discrepancies, as well as some
18 other discrepancies about the Bergen affidavit that
19 we can see that was filed in Fiji, raise serious
20 questions as to whether the US version includes
21 materially false statements and material omissions
22 that go to the heart of probable cause, which is
23 whether Suleyman Kerimov owned the vessel and
24 whether the agent, the affiant, intentionally
25 presented misleading information to the magistrate.

1 So as a result of that --

2 THE COURT: May I ask you -- apologies for
3 interrupting you, but just so I'm clear, is there
4 anything else that you want in addition to the
5 Bergen affidavit? That wasn't entirely clear to me.
6 Are there underlying notes that you seek as well?

7 MS. JARUSINSKY: Yes, Exhibit -- I believe
8 it was Exhibit L -- Yes, I believe it is Exhibit L
9 to our request -- to our first letter. Let me see.
10 No, Exhibit K actually includes our document request
11 that we served on the government.

12 And to be clear, we are requesting the
13 unredacted Bergen affidavit. There are three
14 requests. One, the unredacted Bergen affidavit;
15 number two, documents that Bergen relied on when
16 writing his affidavit, which includes 302s, any sort
17 of memorialization of witness statements, whether
18 they were taken by the FBI or Fiji police or other
19 law enforcement, et cetera. And number three, we've
20 also asked for documents that Bergen didn't
21 necessarily rely on, but were part of the
22 investigation up until that point.

23 So those were the three requests. And
24 obviously the third request is borne from our need
25 to see if there were any other sort of material

1 omissions or misleading statements made in the
2 affidavit, which is why we want to see the
3 investigative file.

4 THE COURT: Thank you. That clarification
5 is helpful. Thank you. I appreciate it.

6 MS. JARUSINSKY: Sure.

7 THE COURT: I understand your Fourth
8 Amendment argument, and I have some questions for
9 both sides about that. But before I get to that, is
10 there any other basis other than your Fourth
11 Amendment argument for which you need the discovery
12 in order to file your opposition to the motion for
13 interlocutory sale?

14 Does it rest and fall on whether or not you
15 have a potentially viable Fourth Amendment argument,
16 your request for expedited discovery?

17 MS. JARUSINSKY: I think so. I'm trying to
18 imagine what else it could rest and fall on. But,
19 yes, our argument is that there are serious concerns
20 here as to whether or not the affidavit was false
21 and misleading or contained material omissions. And
22 under *Franks*, we are entitled to make a substantial
23 preliminary showing, assuming we have the unredacted
24 affidavit as to whether or not that took place to
25 warrant a hearing.

4 MS. JARUSINSKY: Okay.

13 MS. JARUSINSKY: The government is still
14 required under the Fourth Amendment to seek a lawful
15 seizure and to set forth probable cause based on the
16 Fourth Amendment.

17 So the government drafted a seizure
18 warrant. They submitted it to a magistrate judge in
19 the US. In order to seize the vessel from Fiji, the
20 mutual assistance treaty requires a seizure warrant
21 obtained by probable cause. Without it, the US
22 would not have been able to seize the Amadea from
23 Fiji's territorial waters or anywhere.

24 So it cannot be the case that the
25 government is exempted from lawfully establishing

1 probable cause simply because they're going to use
2 that seizure warrant to seize property overseas.

3 I mean, that position would mean that the
4 FBI agents can say whatever they want in an
5 affidavit, so long as they're going to operate
6 outside of the U.S. I mean, this theory or this
7 idea would undo all of the government's mutual
8 assistance treaties, which are premised on our
9 assertion that they've been reviewed by a federal
10 judge and they've met the required standards.
11 Standards that are required under the Fourth
12 Amendment.

13 So that is our position on that, Your
14 Honor. And I think the judges are still required to
15 determine whether or not that the agent established
16 probable cause in a lawful way.

17 THE COURT: Thank you for that, Ms.
18 Jarusinsky. The government also argues that --
19 well, that you're late with this request, that
20 discovery opened in January but you didn't propound
21 the request until February. What's your response to
22 that?

23 MS. JARUSINSKY: Your Honor, we didn't want
24 to make the request prior to knowing whether or not
25 they were going to file the motion for interlocutory

1 sale. And they didn't tell us they were selling the
2 boat. They mentioned an intention to do it, but we
3 wanted to wait and see what their motion would say.

4 THE COURT: Okay. All right. Thank you,
5 Ms. Jarusinsky. Is there anything that you wanted
6 to address before I cut you off that you would still
7 like to, before I turn to the government?

8 MS. JARUSINSKY: I just want to make a
9 couple of points, your Honor, if I may.

10 I think it's very clear that the Fourth
11 Amendment applies to civil forfeiture cases.
12 There's second circuit precedent for that. In
13 addition to that, motions for *Franks* hearings have
14 been brought and considered in civil forfeiture
15 actions. And there must be a probable cause
16 determination even in the instance where there was
17 an arrest warrant issued.

18 So I think that, again, we're requesting
19 limited discovery on this issue, and we think it's
20 very narrowly tailored to the issue, Your Honor.

21 THE COURT: Thank you, Ms. Jarusinsky. One
22 quick question. Do you have an example of where a
23 *Franks* hearing was held where in a situation like
24 this, where we have a non-resident alien and the
25 search or seizure happened extraterritorially? I

1 know it's a very unusual circumstance, but I just
2 thought I would ask.

3 MS. JARUSINSKY: Not off the top of my
4 head.

5 THE COURT: Okay.

6 MS. JARUSINSKY: Yes, of course, and I
7 understand why you would ask. Not off the top of my
8 head. Obviously, we do have cases where *Franks*
9 hearings were considered in the context of a civil
10 forfeiture action.

11 THE COURT: Okay. Thank you, Ms.
12 Jarusinsky.

13 Why don't I turn to the government, and
14 will it be Mr. Sohn?

15 MR. SOHN: Yes, Your Honor.

16 THE COURT: Go ahead and give me your kind
17 of overview here. And as with Ms. Jarusinsky, I may
18 interrupt you with a question.

19 MR. SOHN: Of course, your Honor. We
20 believe that claimant's request for expedited
21 discovery should be denied both procedurally and
22 substantively. Procedurally, as Your Honor pointed
23 out, discovery opened as early as January 17th. And
24 by that day, claimants well knew that we were
25 planning to seek interlocutory sale. In the joint

1 letter that preceded the January 17th conference, we
2 told the other side and the Court that we intend to
3 move for interlocutory sale. If they felt like they
4 needed these documents to oppose interlocutory sale
5 by collaterally trying to attack the seizure
6 warrant, they could have and should have made those
7 requests as early as possible.

8 Instead, they sat on their hands for nearly
9 a month and then served a document request on
10 February 13th demanding production on a severely
11 expedited basis of just a week. That's not proper.
12 Particularly when their document requests bleed
13 heavily into work product and require very careful
14 work product judgment calls.

15 As Ms. Jarusinsky said, they're effectively
16 asking for the entire FBI case file, everything that
17 Agent Bergen relied on and everything he reviewed or
18 created and didn't rely on, so they can try and find
19 supposed omissions. That's the entire case file,
20 Your Honor.

21 So procedurally, we think it is really
22 improper for them to wait a month, then serve a
23 document request and demand severely expedited
24 discovery on an entire case file rife with work
25 product.

1 THE COURT: Thank you, Mr. Sohn.

2 If I may, and I'll obviously let you
3 address your additional point, but let me just ask
4 you on this. Are you planning on producing, and
5 maybe you're still formulating your views here since
6 the time to produce hasn't elapsed yet, but do you
7 have an objection to producing the Bergen affidavit
8 on the merits, or is it the timing of it? Is that
9 the only thing at issue?

10 MR. SOHN: So on the question of what will
11 we produce, I would expect that we would produce
12 some, but not all of what they're requesting, but
13 this will require careful judgment calls.

1 turn over the affidavit. But to be perfectly frank,
2 Your Honor, again, I do think we need to make
3 careful both relevance and work product calls in the
4 context of Rule 26.

5 THE COURT: Okay. I just wanted to see if
6 you had made any determination already about the
7 discoverability of the affidavit; and if so, if the
8 only objection here right now was as to the timing
9 of its production. But it sounds like you're not
10 quite there yet.

11 I know I cut you off. Please continue.

12 MR. SOHN: Of course.

13 So, substantively claimants have said that
14 they need these materials to oppose interlocutory
15 sale by attacking the seizure warrant. But
16 interlocutory sale is based on this court's
17 jurisdiction and the government's custody. This
18 court, of course, has jurisdiction based on the
19 civil forfeiture complaint. The government has
20 custody now based on the arrest warrant in rem.
21 Attacks on the 2022 seizure warrant would not
22 disturb either the complaint or the arrest warrant
23 in rem, and, thus, they could not preclude an
24 interlocutory sale order.

25 And then, furthermore, their entire

1 argument for attacking the seizure warrant, even if
2 undoing the seizure warrant could somehow unravel
3 interlocutory sale or preclude interlocutory sale,
4 which it can't, but even if it could, their entire
5 argument for attacking the seizure warrant is based
6 on alleged Fourth Amendment violations. I believe
7 Ms. Jarusinsky admitted that.

8 But as Your Honor pointed out, the Fourth
9 Amendment does not apply when the US government
10 seizes property of a non-resident alien in a foreign
11 country. From the very first two sentences of
12 *Verdugo-Urquidez*, "The question presented by this
13 case is whether the Fourth Amendment applies to the
14 search and seizure by the United States agents of
15 property that is owned by a non-resident alien and
16 located in a foreign country." We hold that it does
17 not.

18 So our position is that *Verdugo-Urquidez*
19 squarely precludes the Fourth Amendment argument
20 that underpins their entire request for a *Franks*
21 hearing and associated relief.

22 Now, Ms. Jarusinsky said that we got a
23 seizure warrant. Yes, we did. As a matter of DOJ
24 policy, we tend to get seizure warrants when we try
25 to restrain and seize property abroad. As a matter

1 of international comity, both unwritten and
2 potentially under treaty obligations, many of our
3 foreign counterparts expect that, but it does not
4 implicate the Fourth Amendment. And the Fourth
5 Amendment, as Ms. Jarusinsky admitted, is the sole
6 basis for their request. So we believe their
7 request fails out of the gate.

8 THE COURT: Okay. Thank you for that, Mr.
9 Sohn.

10 MS. JARUSINSKY: Your Honor, may I respond
11 to some of those points?

12 THE COURT: Yes. I do have a question for
13 Mr. Sohn first. But I will give you a chance to
14 respond, Ms. Jarusinsky.

15 Mr. Sohn, just so I understand how this all
16 unfolds, and it's probably not necessary for me to
17 resolve this discovery dispute, but just so that I
18 understand how all of this works. If ultimately,
19 and I don't have an opposition yet on the motion for
20 interlocutory sale, but let's say I grant your
21 motion for interlocutory sale but then I
22 subsequently rule in favor of the claimants on the
23 motion to dismiss. What happens if the sale has
24 already taken place at that point?

25 MR. SOHN: Well, once the sale takes place,

1 the substitute res becomes the sale proceeds. So at
2 that point, assuming we have an effectuated
3 consummated sale, under Your Honor's authority, an
4 innocent third party would have sailed off with the
5 boat. The substitute res would be the sales
6 proceeds. And if our case is dismissed with
7 prejudice, claimants would get the sales proceeds,
8 because that is now the res.

9 THE COURT: That's what I assumed, but I
10 just wanted to confirm that. And I appreciate the
11 remedial lesson. So thanks for clarifying that.

12 Okay, Ms. Jarusinsky, I want to give you a
13 chance to respond to Mr. Sohn.

14 MS. JARUSINSKY: Sure. I want to go to the
15 point that Mr. Sohn made about the arrest warrant.
16 So the arrest warrant is issued. If you look at
17 Rule -- and like I said, there must be a probable
18 cause determination, and that's sort of written
19 within the rules. If you look at Rule G(3), I'm
20 talking about the supplemental rules and the rule
21 pursuant to which the arrest warrant here was
22 issued. Rule G(3)(b)(i), that states that The clerk
23 must issue a warrant to arrest the property upon the
24 filing of a forfeiture complaint if it is already in
25 the government's possession, custody or control.

1 That means that the government has already somehow
2 seized the property pursuant to legal process; for
3 example, a search warrant based on probable cause.
4 And it's clear -- so my point is that even though
5 the arrest warrant comes into play, it doesn't
6 validate -- in fact, it almost sort of subsumes or
7 sort of relies on the fact that the property is
8 already within the government's possession, custody
9 or control pursuant to some sort of legal process;
10 for example, search warrant based on probable cause.

11 If you look in the next provision, for
12 example, Rule G(3)(b)(ii), if the property is not in
13 the government's possession, custody or control, the
14 court must find probable cause to issue a warrant to
15 arrest the property.

16 Now, clearly, there has to be some probable
17 cause determination in either case. And the point
18 is, a finding of probable cause must have been made
19 at some point, either in a pre-litigation seizure or
20 at the time the complaint is filed. And there's no
21 carve out in these rules for property that's
22 overseas.

23 So I just wanted to make that point, Your
24 Honor.

25 THE COURT: Okay. Thank you, Ms.

1 Jarusinsky.

2 MS. JARUSINSKY: Yes. Sure. Sure.

3 THE COURT: I'll let you make an additional
4 point, but since I haven't heard that point before,
5 I want to give the government a chance to respond to
6 it before you turn to your next point. And maybe
7 it's the first time you've heard it, too, Mr. Sohn,
8 but would you care to respond?

9 MR. SOHN: Sure. As I understand it, Ms.
10 Jarusinsky is arguing that, well, the arrest warrant
11 is not really independent of the seizure warrant
12 because the seizure warrant is what put the property
13 in the government's custody, and, therefore, enabled
14 the clerk to issue the arrest warrant under Rule
15 G(b)(i).

16 Well, even if the Court were inclined to
17 credit that argument, as Ms. Jarusinsky pointed out,
18 when the property is not in the government's
19 possession, the Court issues an arrest warrant upon
20 probable cause. And that's based on the four
21 corners of the complaint. The court analyzes the
22 complaint to see whether it evinces probable cause
23 to issue a warrant.

24 So in other words, Your Honor, if Your
25 Honor felt that Ms. Jarusinsky's motion was

1 otherwise meritorious, but the arrest warrant was
2 the only thing hanging it up, Your Honor could
3 analyze the four corners of the complaint to decide
4 whether there's probable cause to say, okay, would
5 the government have a right to possess this property
6 absent a seizure warrant. Because even absent a
7 seizure warrant, the complaint exists. And again,
8 in a hypothetical no seizure warrant world, this
9 court would be analyzing the four corners of the
10 complaint under Rule (b)(ii) to decide whether to
11 issue an arrest warrant.

12 So if the Court felt that it needed to
13 decide whether there is or would be a valid arrest
14 warrant absent the seizure warrant, then certainly
15 it could say, okay, would I have issued an arrest
16 warrant anyway? Does the four corners of the
17 complaint show probable cause?

18 But I think Your Honor need not get there
19 because, frankly, the Fourth Amendment issues are
20 dispositive. They're seeking a *Franks* hearing under
21 the Fourth Amendment. They're seeking to unravel
22 the seizure warrant under the Fourth Amendment.
23 They're seeking to exclude evidence under the Fourth
24 Amendment. And we think that really does fail out
25 of the gate.

1 But to circle back again, yeah, if Your
2 Honor wished to kind of test the arrest warrant or
3 whether an arrest warrant should issue, it certainly
4 could examine probable cause on the four corners of
5 the complaint if it wished.

6 THE COURT: Okay. Thank you, Mr. Sohn.

7 Ms. Jarusinsky, you were going to make
8 another point before I cut you off.

9 MS. JARUSINSKY: Yes. Let me see. Let me
10 just take a look at my notes.

11 Yeah, I mean, I just want to go back to,
12 Your Honor, some of the questions you had for
13 Mr. Sohn about turning over the affidavit and
14 responding to his point about work product calls.

15 Like I said, some of the things that we're
16 requesting, the unredacted affidavit, 302s witness
17 statements. We tried to narrow the scope of our
18 request, with respect -- when we were in discussions
19 with the government prior to coming to Your Honor
20 for intervention. And we don't think that there
21 would be any sort of tedious work product judgment
22 calls with respect to the affidavit and with respect
23 to witness statements such as 302s and other
24 documents that reflect summaries of what the
25 witnesses said.

3 THE COURT: Okay. Thank you, Ms.
4 Jarusinsky. Anything else?

5 MS. JARUSINSKY: I just want to point out a
6 case, Your Honor, on this topic of, you know,
7 whether or not the Fourth Amendment applies.

21 I think that's all I need to hear on the
22 request for discovery. And I'll put something out,
23 hopefully quickly, so you all know where things
24 stand, as I know currently, your opposition is due
25 tomorrow. Or I should say the claimant's opposition

1 is due tomorrow.

2 If I could turn briefly now to the request
3 to file something under seal. And I know that there
4 are statements that have been filed in redacted
5 form, and I think I've made clear that I've accepted
6 those for filing on the public docket in redacted
7 form. But there's a letter that the claimants have
8 asked to file under seal. And I will say that it's
9 not obvious to me what the basis is for that.

10 So I'll let -- Ms. Jarusinsky, I'll let you
11 address that. Why don't you go ahead.

12 MS. JARUSINSKY: Sure. Your Honor, the
13 letter can be public. I was really just hoping to
14 keep from the public the attachments that were
15 unredacted.

16 THE COURT: I understand. The unredacted
17 attachments will, I think, remain under seal, and
18 that's fine. So we will put that letter on the
19 public docket within the next 24 hours.

20 Well, I really appreciate everyone's time.
21 Is there anything else that the parties would like
22 to raise? Let me start with the government.

23 Mr. Sohn?

24 MR. SOHN: Nothing from the government,
25 Your Honor.

1 THE COURT: Okay. Thank you, Mr. Sohn.

2 For the claimants, Ms. Jarusinsky?

3 MS. JARUSINSKY: No, Your Honor, just to
4 reiterate, you know, if we could even get limited
5 discovery of the unredacted affidavit for starters,
6 that would certainly be helpful with requests in
7 connection with our opposition.

8 THE COURT: Understood.

9 MR. FORD: Your Honor, this is Adam Ford
10 just jumping in for the first time. Maybe I would
11 just say it at the end, and I understand Your Honor
12 did just say that you don't think you require
13 further briefing on any of these issues. But as
14 I've sat here and listened in, I do wonder if maybe
15 our -- because I know Your Honor had asked us for a
16 case regarding in connection with the *Verdugo* and
17 obviously the application of the Fourth Amendment
18 overseas. We don't have that at our fingertips.
19 But based on our research on this issue and our firm
20 belief that there is applicability, I wonder if we
21 couldn't be given an opportunity to submit something
22 to Your Honor by tomorrow at noon on this issue.
23 Because it does sound like this is a threshold
24 issue. And at this point, I think the government
25 has written one paragraph on it, and I think we put

1 in a couple of sentences. And given the
2 significance of this, I do wonder if we shouldn't be
3 allowed to provide Your Honor with some additional
4 citations on this point.

5 THE COURT: Thank you, Mr. Ford, and I do
6 appreciate your request. I do think I have
7 everything that I need right now. And I, and my
8 Chambers are capable of looking at the issue more
9 closely. So right now I don't think that we need
10 anything, but obviously, if something changes, I
11 will let you know, but I appreciate the offer.

12 MR. FORD: Thank you, Your Honor.

13 THE COURT: Thank you.

14 Okay. Well, as I said, we'll get a letter
15 from the claimants on the docket, and we will try to
16 get a ruling on the discovery request as quickly as
17 possible in light of the claimant's opposition
18 deadline tomorrow.

19 Thank you, all, very much for your time.

20 MR. SOHN: Thank you, Your Honor.

21 MS. JARUSINSKY: Thank you.

22 MR. FORD: Thank you, Your Honor. Have a
23 good day.

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1 C E R T I F I C A T E
2

3 I, Adrienne M. Mignano, certify that the
4 foregoing transcript of proceedings in the case of
5 USA v. The M/Y Amadea; Docket #23cv9304 was prepared
6 using digital transcription software and is a true
7 and accurate record of the proceedings.

8
9
10 Signature Adrienne M. Mignano
11 ADRIENNE M. MIGNANO, RPR

12
13 Date: March 5, 2024
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